

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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6D GLOBAL TECHNOLOGIES, INC.,

Plaintiff,

Docket No.:

- against -

DECLARATION OF
TEJUNE KANG

BEI LU,

Defendant.

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TEJUNE KANG hereby declares, under penalty of perjury pursuant to 28 U.S.C. § 1746, as follows:

1. I am the CEO of the Plaintiff 6D Global Technologies, Inc. (hereinafter “SIXD”).
2. On December 12, 2014, SIXD initiated trading on the NASDAQ Stock Exchange.
3. SIXD completed a merger of CleanTech Innovations, Inc. (hereinafter “CTEK”) for certain consideration described prior thereto in a divestiture agreement and other documents.
4. Bei Lu was the CEO of CTEK.
5. In order for SIXD to complete the transition and merger of CTEK with SIXD, all of the outstanding CTEK shares needed to be cancelled. Accordingly, as part of the agreement, SIXD provided for certain consideration in exchange for the promise by the outstanding shareholders to surrender their shares.
6. At the time of the divestiture agreement, there were collectively 15,229,403 shares outstanding. The shareholders of these outstanding shares all agreed to surrender them. Many of the shares were held by Certificate, which was signed by the

shareholders at the time of the Divesture Agreement. SIXD relied upon the Agreements containing the promise to cancel the Electronic shares. See paragraph 2.01(a)(iv) of Divesture and Exchange Agreement annexed as Exhibit A and paragraph 2 of Escrow Agreement annexed as Exhibit B.

7. Accordingly, SIXD represented to its shareholders and the Securities and Exchange Commission, that the shareholders would cancel their outstanding shares.
8. In exchange for Bei Lu's promise, among other things SIXD agreed to the assignment of all shares of a company called Creative Bellows to Bei Lu.
9. On September 30, 2014, all shares of Creative Bellows were assigned to a company called Clean Tech Solutions, Ltd. Thereafter, Clean Tech Solutions, Ltd. on September 30, 2014 all shares of Creative Bellows Co., Ltd. were assigned to Bei Lu.
10. To date, all shareholders have cancelled their outstanding shares except one shareholder – the defendant Bei Lu. Ms. Lu executed a cancellation of her 9,482,751 Certificated shares. However, Bei Lu holds 15,566 of electronic shares that she refuses to cancel, despite her agreement.
11. Aaron Goldberg, a partner at Holland and Knight, represented CTEK in the transitioning of CTEK to SIXD.
12. Mr. Goldberg reminded Bei Lu of her obligations to cancel the remaining 15,566 shares that she held electronically. Bei Lu maintained her refusal.
13. SIXD, as a NASDAQ listed company, is now in a dangerous position in that its auditor, BDO USA, LLP, requires the information for preparation of the annual audited report (form 10K), by February 28, 2015. The duty to file its annual report on

a timely basis, March 30, 2015, is outlined in the SEC form 10K filing instructions, annexed as Exhibit C.

14. In order for SIXD to comply with the SEC filing requirements, the shareholders that promised to cancel the shares must satisfy their obligations. All such shareholders have satisfied their obligations except for Bei Lu's 15,566 shares, which Bei Lu refuses to cancel despite her clear and undisputed promise to do so.
15. We come to this Court asking for emergent relief in the form of an order deeming Bei Lu's 15,566 shares cancelled.
16. Bei Lu has no reason to not cancel the shares other than her belief that her breach of contract will not result in any difficulties for her. The electronic shares are currently held by a national clearing firm called, COR Clearing LLC. The process for cancellation is that COR Clearing LLC electronically transmits the shares to a SEC licensed stock transfer organization by Interwest Transfer Company, Inc. Interwest then cancels the shares.
17. Once the shares are cancelled the company will have an accurate share count and will be able to submit its correct financials to BDO USA, LLP, to timely file its annual report and fulfill its obligation to the general public. We therefore ask for specific performance in the form of an order deeming the shares cancelled, directing COR Clearing LLC and directing the transfer agent, Interwest Transfer Company, Inc., to cancel them.
18. Plaintiff has come to court under the faster method of Order to Show Cause since the SEC filing deadline is upon us and it will take BDO USA, LLP approximately 30 days to prepare our financials.

Dated: New York, New York
February 16, 2015



Tejune Kang
Chairman and CEO of 6D Global
NASDAQ Stock Symbol: SIXD